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[Additional Defendants' Counsel continued on next page]

*Attorneys for Defendants MindGeek
S.à r.l., MG Freesites Ltd, MindGeek USA
Incorporated, MG Premium Ltd, MG
Global Entertainment Inc., and 9219-
1568 Quebec Inc.*

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

K.A.,

Plaintiff,

v.

MINDGEEK S.A.R.L. a foreign entity;
MG FREESITES LTD, a foreign entity;
MINDGEEK USA INCORPORATED, a
Delaware corporation; MG PREMIUM
LTD, a foreign entity; MG GLOBAL
ENTERTAINMENT INC., a Delaware
corporation; 9219-1568 QUEBEC, INC.,
a foreign entity; BERND BERGMAIR, a
foreign individual; FERAS ANTOON, a
foreign individual; DAVID TASSILLO,
a foreign individual; VISA INC., a
Delaware corporation; REDWOOD
CAPITAL MANAGEMENT, LLC, a
Delaware limited liability company;
REDWOOD DOE FUNDS 1-7;
COLBECK CAPITAL
MANAGEMENT, LLC, a Delaware
limited liability company; COLBECK
DOE FUNDS 1-3,

Defendants.

Case No. 2:24-cv-04786-WLH-ADS

**JOINT STIPULATION RE
BRIEFING SCHEDULE FOR
DEFENDANTS' MOTIONS TO
DISMISS**

Judge: Hon. Wesley L. Hsu

Complaint Filed: June 7, 2024

Trial Date: None Set

1 [Additional Defendants' Counsel continued from caption page]

2 Seth R. Goldman (*pro hac vice app. forthcoming*)
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Defendants MindGeek S.à r.l., MG Freesites Ltd, MindGeek USA Incorporated, MG Premium Ltd, MG Global Entertainment Inc., 9219-1568 Quebec Inc., Bernd Bergmair, Feras Antoon, David Tassillo, Visa Inc., Redwood Capital Management, LLC, and Colbeck Capital Management, LLC (collectively, “Defendants”) and Plaintiff K.A. (“Plaintiff”) (collectively with Defendants, the “Parties”), by and through their counsel, hereby stipulate as follows:

WHEREAS, on June 7, 2024, Plaintiff filed her Complaint (ECF No. 1, hereafter referred to as the “Complaint”);

WHEREAS, the Complaint includes 17 causes of action and 456 paragraphs of allegations across 125 pages (*id.*);

WHEREAS, Plaintiff sent waivers to various Defendants and filed these executed waivers with the Court, resulting in the following deadlines for Defendants to answer, move, or otherwise respond to the Complaint:

<u>Defendant</u>	<u>Days to Add per FRCP 4(d)(3)</u>	<u>Date Waiver Sent</u>	<u>Resulting Deadline to Answer, Move, or Otherwise Respond</u>
MindGeek S.à r.l., a foreign entity	90	6/14/2024	9/12/2024
MG Freesites Ltd, a foreign entity	90	6/14/2024	9/12/2024
MindGeek USA Incorporated, a Delaware corporation	60	6/14/2024	8/13/2024
MG Premium Ltd, a foreign entity	90	6/14/2024	9/12/2024
MG Global	60	6/14/2024	8/13/2024

Entertainment Inc., a Delaware corporation			
9219-1568 Quebec Inc., a foreign entity	90	6/14/2024	9/12/2024
Feras Antoon, a foreign individual	90	6/27/2024	9/25/2024
David Tassillo, a foreign individual	90	6/27/2024	9/25/2024
Visa Inc., a Delaware corporation	60	6/14/2024	8/13/2024
Redwood Capital Management, LLC, a Delaware limited liability company	60	6/26/2024	8/26/2024
Colbeck Capital Management, LLC, a Delaware limited liability company	60	6/14/2024	8/13/2024
Bernd Bergmair, a foreign individual ¹	90	6/14/2024	9/12/2024

WHEREAS, the Parties agree that given the volume and complexity of the Complaint and the benefits of having a unified briefing schedule for all Defendants, good cause exists for additional time to answer, move, or otherwise respond to the Complaint, and good cause exists to set the subsequent briefing deadlines as follows:

¹ Bernd Bergmair signed and returned a waiver of service to Plaintiff on 7/15/2024, but Plaintiff has yet to file it with the Court.

October 15, 2024: Each Defendant's Deadline to Answer, Move, or Otherwise Respond to the Complaint;

November 22, 2024: Plaintiff's Deadline to Respond to Each Defendant's Answer, Motion, or Response (if and as applicable);

December 13, 2024: Each Defendant's Deadline to File Replies (if and as applicable);

January 10, 2025: Proposed Hearing on Each Defendant's Answer, Motion or Response (if and as applicable)

WHEREAS, the Parties agree that given the volume and complexity of the Complaint, good cause exists to permit Defendants a modest increase in the number of pages for their motion(s), not to exceed a total of 40 pages; and

WHEREAS, the Parties agree that Defendants preserve all objections and defenses to the Complaint, including any objection or defense on the ground of lack of personal jurisdiction;

IT IS THEREFORE STIPULATED AND AGREED that there is good cause for the Court to extend Defendants' deadline to answer, move or otherwise respond to the Complaint and therefore that, subject to the approval of this Court, the subsequent briefing deadlines shall be:

October 15, 2024: Each Defendant's Deadline to Answer, Move, or Otherwise Respond to the Complaint;

November 22, 2024: Plaintiff's Deadline to Respond to Each Defendant's Answer, Motion, or Response (if and as applicable);

December 13, 2024: Each Defendant's Deadline to File Replies (if and as applicable);

January 10, 2025: Proposed Hearing on Each Defendant's Answer, Motion or Response (if and as applicable)

1 IT IS THEREFORE FURTHER STIPULATED AND AGREED that, subject
2 to the approval of this Court, there is good cause to increase the page limit for each
3 motion in response to the Complaint to 40 pages or less.

4 IT IS THEREFORE FURTHER STIPULATED AND AGREED that
5 Defendants preserve all objections and defenses to the Complaint, including all
6 objections and defenses on the ground of lack of personal jurisdiction.

7 Accordingly, the Parties respectfully request that this Court sign the
8 [Proposed] Order setting forth this amended briefing schedule and page limit
9 increases set forth above.

10 IT IS SO STIPULATED.

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12 DATED: August 9, 2024

MINTZ LEVIN COHN FERRIS GLOVSKY
AND POPEO P.C.

13
14 By /s/ Esteban Morales

15 Seth R. Goldman (*pro hac vice app.*
forthcoming)

16 Peter A. Biagetti (*pro hac vice app.*
forthcoming)

17 Arameh Z. O'Boyle

18 Esteban Morales

19 *Attorneys for Defendants MindGeek*
20 *S.à r.l., MG Freesites Ltd, MindGeek USA*
21 *Incorporated, MG Premium Ltd, MG*
22 *Global Entertainment Inc., and 9219-1568*
23 *Quebec Inc.*
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1
2 DATED: August 9, 2024

BROWN RUDNICK LLP

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4
5 By /s/ Lauren Tabaksblat
6 Michael J. Bowe
7 Lauren Tabaksblat
8 *Attorneys for Plaintiff K.A.*

9 DATED: August 9, 2024

WEIL, GOTSHAL & MANGES LLP

10
11 By /s/ Drew Tulumello
12 Drew Tulumello
13 *Attorneys for Defendant Visa Inc.*

14 DATED: August 9, 2024

MORVILLO ABRAMOWITZ GRAND
IASON & ANELLO PC

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16
17 By /s/ Jonathan S. Sack
18 Jonathan S. Sack
19 *Attorneys for Defendant David Tassillo*

20
21 DATED: August 9, 2024

COHEN & GRESSER LLP

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23 By /s/ Matthew V. Povolny
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25 *Attorneys for Defendant Feras Antoon*
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1
2 DATED: August 9, 2024

WALDEN MACHT HARAN & WILLIAMS
LLP

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4
5 By /s/ Ronald G. White

Ronald G. White

Attorneys for Defendant Bernd Bergmair

6
7
8 DATED: August 9, 2024

PAUL HASTINGS LLP

9
10 By /s/ James M. Pearl

James M. Pearl

Adam M. Reich

Emma Lanzon

Kiaura Clark

*Attorneys for Defendant Redwood Capital
Management, LLC*

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12
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14
15 DATED: August 9, 2024

WHITE & CASE LLP

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17
18 By /s/ Kevin C. Adam

David G. Hille

Kevin C. Adam

Russell J. Gould

*Attorneys for Defendant Colbeck Capital
Management, LLC*

ATTESTATION STATEMENT

I, Esteban Morales, the filer of this declaration, attest pursuant to Rule 5-4.3.4(a)(2) of the Local Rules for the United States District Court for the Central District of California that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: August 9, 2024

MINTZ LEVIN COHN FERRIS
GLOVSKY AND POPEO P.C.

/s/ Esteban Morales

Esteban Morales

*Attorney for Defendants MindGeek
S.à r.l., MG Freesites Ltd, MindGeek
USA Incorporated, MG Premium Ltd,
MG Global Entertainment Inc., and
9219-1568 Quebec Inc.*

CERTIFICATE OF SERVICE

I, the undersigned counsel of record for Defendants MindGeek S.à r.l., MG Freesites Ltd, MindGeek USA Incorporated, MG Premium Ltd, MG Global Entertainment Inc., and 9219-1568 Quebec Inc., certify that the foregoing instrument was served pursuant to the Federal Rules of Civil Procedure on August 9, 2024 upon all counsel of record via ECF.

Dated: August 9, 2024

MINTZ LEVIN COHN FERRIS
GLOVSKY AND POPEO P.C.

/s/ Esteban Morales

Esteban Morales

*Attorney for Defendants MindGeek
S.à r.l., MG Freesites Ltd, MindGeek
USA Incorporated, MG Premium Ltd,
MG Global Entertainment Inc., and
9219-1568 Quebec Inc.*